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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF ESTHER KIM
CHANG IN SUPPORT OF
DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S OPPOSITION
TO WAYMO LLC'S MOTION TO
COMPEL**

Trial Date: February 5, 2018

1 I, Esther Kim Chang, declare as follows:

2 1. I am an attorney with the law firm of Morrison & Foerster LLP. I am a member in
3 good standing of the Bar of the State of California. I make this declaration based on personal
4 knowledge and, if called as a witness, I could and would testify competently to the matters set
5 forth herein. I make this declaration in support of Defendants Uber Technologies, Inc. and
6 Ottomotto LLC's ("Uber") Opposition to Defendant Waymo LLC's Motion to Compel.

7 2. Attached hereto as **Exhibit A** are relevant pages from the deposition of
8 Travis Kalanick, taken on December 14, 2017.

9 3. Attached hereto as **Exhibit B** are relevant pages from the deposition of
10 Angela Padilla, taken on December 22, 2017.

11 4. Attached hereto as **Exhibit C** are relevant pages from the deposition of
12 Sidney Majalya, taken on December 20, 2017.

13 5. Attached hereto as **Exhibit D** are relevant pages from the deposition of
14 Joe Spiegler, taken on December 22, 2017.

15 6. Attached hereto as **Exhibit E** is a true and correct copy of an email from
16 Kaitlyn Murphy to John Cooper and counsel for Waymo, dated December 29, 2017.

17 7. Attached hereto as **Exhibit F** is a true and correct copy of Uber's Privilege Log Re
18 Communications with Trial Team Re Jacobs Documents pre November 22, 2017, dated
19 December 10, 2017.

20 8. Attached hereto as **Exhibit G** is a true and correct copy of a document produced in
21 this litigation bearing Bates numbers WAYMO-UBER00057551— WAYMO-UBER00057552.

22 9. Attached hereto as **Exhibit H** is a true and correct copy of a document produced in
23 this litigation bearing Bates numbers WAYMO-UBER00009522— WAYMO-UBER00009524.

24 10. Attached hereto as **Exhibit I** is a true and correct copy of an email from
25 Sylvia Rivera to Andrea Roberts, dated December 22, 2017.

26 11. Attached hereto as **Exhibit J** is a true and correct copy of a document produced in
27 this litigation bearing Bates numbers UBER00341361—UBER00341362.
28

ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. Gonzalez, am the ECF User whose ID and password are being used to file this Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Esther Kim Chang has concurred in this filing.

Dated: January 4, 2018

/s/ Arturo J. González

ARTURO J. GONZÁLEZ

Exhibit A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,
Plaintiff,

vs.

Case No. 17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;
OTTOMOTTO, LLC; OTTO
TRUCKING LLC,
Defendants.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

VIDEO DEPOSITION OF TRAVIS KALANICK

San Francisco, California

Thursday, December 14, 2017

Volume III

REPORTED BY:

REBECCA L. ROMANO, RPR, CSR No. 12546

JOB NO. 2771242

PAGES 504 - 668

Page 504

1 generally, was -- you know, we had a -- you know, a 12:45:18
2 former AUSA, a former prosecutor in Joe Sullivan
3 sort of overseeing -- you know, there are a lot of
4 groups in his -- you know, in his domain, but that
5 was one of them, and felt pretty confident that, 12:45:31
6 you know, he sort of knew how to manage that kind
7 of -- that kind of effort.

8 Q. Okay. At some point in time, you did --
9 became aware of allegations that Ric Jacobs, now
10 former Uber employee, made; is that -- is that 12:45:53
11 right?

12 A. Yeah. There was an email that was --
13 that, I think, he sent when he resigned, and I
14 would -- I -- I received that email.

15 Q. Okay. What -- how did you react to that 12:46:02
16 email when you saw it?

17 A. Well, look, I mean, it was a -- it was a
18 serious email. So I took it seriously and
19 forwarded it to Joe Sullivan, who runs security. I
20 was obviously concerned; like, hey, is any of this 12:46:21
21 true?

22 Q. Is that something that you asked him, or
23 it's just you're -- that's just the reaction, which
24 is what I --

25 A. Well, that's certainly -- 12:46:31

1 Q. (By Mr. Perlson) Okay. But counsel for 12:49:42
2 Uber was present at the interview?
3 A. I don't remember.
4 Q. Okay.
5 A. I don't remember anybody -- sorry. I 12:49:48
6 don't remember any Uber internal counsel being
7 there. There was Uber external counsel.
8 Q. Right.
9 A. Yeah.
10 Q. Wilmer was the firm that Uber had 12:49:58
11 retained, right?
12 A. Correct. Yeah.
13 Q. Af- -- subsequent to your email -- I'm
14 sorry, not your email. Sorry.
15 A. Yeah. 12:50:11
16 Q. Subsequent to the email that Mr. Jacobs
17 sent you in April, there was a -- he sent a demand
18 letter to -- to Uber. Do you -- did -- in May.
19 Did you see -- receive that?
20 A. I did not. 12:50:19
21 Q. Okay. And have you ever seen that?
22 A. No.
23 Q. Have you ever discussed the -- the
24 contents of -- of that letter?
25 A. At a very high level in prep for this 12:50:28

Page 526

1 deposition. 12:50:31

2 Q. Okay. Had -- prior to your preparation
3 for this deposition, had anyone ever told you what
4 the contents of the allegation of the -- the May
5 demand letter were? 12:50:46

6 A. No.

7 Q. Did you know that it existed before your
8 prep for your deposition?

9 A. At -- at --

10 MS. DUNN: Objection to form. 12:50:56

11 THE DEPONENT: -- at some point I knew
12 that some kind of letter existed, but I didn't know
13 what it was.

14 Q. (By Mr. Perlson) Did you ever ask to see
15 it? 12:51:04

16 A. I don't remember if I asked to see it. I
17 know I never got to saw -- see it, and it may have
18 been because there was an independent
19 investigation. I -- I don't remember specifically
20 asking for it. 12:51:16

21 Q. Did you ever ask for the results of the
22 investigation into the allegations made by
23 Mr. Jacobs?

24 A. Yes.

25 Q. When was that? 12:51:30

Page 527

1 I, Rebecca L. Romano, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

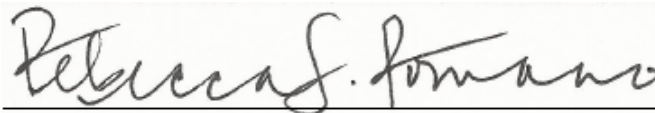
4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were administered an oath;
8 that a record of the proceedings was made by me
9 using machine shorthand which was thereafter
10 transcribed under my direction; that the foregoing
11 transcript is true record of the testimony given.

12 Further, that if the foregoing pertains to the
13 original transcript of a deposition in a Federal
14 Case, before completion of the proceedings, review
15 of the transcript [] was [x] was not requested.

16 I further certify I am neither financially
17 interested in the action nor a relative or employee
18 of any attorney or any party to this action.

19 IN WITNESS WHEREOF, I have this date
20 subscribed my name.

21 Dated: December 15, 2017

22
23 
24

25 Rebecca L. Romano, RPR,
CSR. No 12546

Exhibit B

**REDACTED
VERSION
OF DOCUMENT
SOUGHT TO BE
SEALED**

Exhibit C

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)
)
Plaintiff,)
) Case No.
vs.) 3:17-cv-000939-WHA
)
UBER TECHNOLOGIES, INC.;)
OTTOMOTTO LLC; OTTO TRUCKING,)
INC.,)
)
Defendants.)
_____)

*** HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY ***

VIDEOTAPED DEPOSITION OF SIDNEY MAJALYA
San Francisco, California
Wednesday, December 20, 2017
Volume I

Reported by:
CARLA SOARES
CSR No. 5908
Job No. 2779413

Pages 1 - 267

Page 1

1 don't -- but Salle may have already been on it. So 13:47:27
2 I don't exactly remember who she forwarded the
3 e-mail to.
4 Q Do you know if Mr. Kalanick forwarded
5 Mr. Jacobs' e-mail to anyone? 13:47:40
6 A I don't.
7 Q Do you know if Ms. Hazelbaker forwarded it
8 to anybody?
9 A I didn't even recall that she received it.
10 Q If you look at the bottom of Exhibit 9659, 13:47:49
11 you'll see that she's on the e-mail from Mr. Jacobs,
12 right?
13 A Yes.
14 Q Do you see that Ms. Hornsey is also on the
15 e-mail? 13:47:57
16 A I do.
17 Q Do you know if Ms. Hornsey forwarded
18 Mr. Jacobs' resignation e-mail to anybody?
19 A I do not.
20 Q When you received Mr. Jacobs' resignation 13:48:07
21 e-mail, who did you discuss it with, other than
22 Mr. Spiegler and Ms. Yoo?
23 A I think I already testified that I
24 discussed it at some point with Ms. Padilla.
25 Q Anybody else? 13:48:22

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2 I don't exactly know.

5 A I've interacted with O'Melveny & Myers, 14:51:29
6 but I would not say it was specifically related to
7 the allegations in the Jacobs letter.

11	MS. DUNN: Form.
----	-----------------

13 BY MR. EISEMAN:

16 A We may have had one meeting, one or two
17 conversations with Patrick Robbins about the Jacobs
18 matter.

21 A Joe Spiegler and myself. Yeah.

23 A I don't. Likely it would have been in the
24 June time frame at some point, but I don't have a
25 specific recollection.

1 those are the people that I recall having any 15:06:08
2 knowledge or interaction about the Jacobs letter and
3 allegations.

4 Q Do you know if anybody besides Ms. Padilla
5 and the litigation group at Uber knew about the 15:06:18
6 letter?

7 A Oh, let me -- I'm sorry. Let me add one
8 more person to my prior answer.

9 I believe Candace Kelly at some time also
10 knew. 15:06:31

11 Q Right. Okay. Anybody else?

12 A No. I'm sorry. If you could repeat your
13 last question.

14 Q Yeah.

15 Do you know if anybody within the Uber 15:06:40
16 litigation group knew about the Jacobs issues?

17 A Other than Angela, I don't think so.

18 And again, when you say "the litigation
19 group," the litigation and employment group are both
20 under Angela's auspices, but I'm separating them for 15:07:04
21 purposes of this response.

22 MR. EISEMAN: All right. Let's mark as
23 Exhibit 9664 the next document.

24 (Exhibit 9664 was marked for
25 identification and is attached hereto.) 15:07:21

Page 186

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were administered an oath; that
8 a record of the proceedings was made by me using
9 machine shorthand which was thereafter transcribed
10 under my direction; that the foregoing transcript is
11 a true record of the testimony given.

12 Further, that if the foregoing pertains to
13 the original transcript of a deposition in a Federal
14 Case, before completion of the proceedings, review
15 of the transcript [] was [X] was not requested.

16 I further certify I am neither financially
17 interested in the action nor a relative or employee
18 of any attorney or any party to this action.

19 IN WITNESS WHEREOF, I have this date
20 subscribed my name.

21 Dated: December 21, 2017

22 
23

24 CARLA SOARES

25 CSR No. 5908

Exhibit D

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

Case No.

UBER TECHNOLOGIES, INC.; 17-cv-00939-WHA

OTTOMOTTO, LLC; OTTO

TRUCKING LLC,

Defendants.

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF JOE SPIEGLER

San Francisco, California

Friday, December 22, 2017

Volume I

REPORTED BY:

REBECCA L. ROMANO, RPR, CSR No. 12546

JOB NO. 2771356

PAGES 1 - 307

Page 1

1 conversation with Kalanick, so I just want to be 10:51:55
2 sure what -- where we are.

3 MR. EISEMAN: Right. Let me try to ask a
4 different question then.

5 Q. (By Mr. Eiseman) Prior to June 22nd, did 10:52:03
6 you have any discussions with anybody who was the
7 subject of Mr. Jacobs' allegations in his
8 resignation email or his lawyer's later letter?

9 A. Yes.

10 Q. Who did you speak with? 10:52:16

11 A. I spoke with Joe Sullivan.

12 Q. Anybody else?

13 A. I don't recall other individuals. I
14 believe Mat Henley, I believe Jeff Jones, in the
15 context of a meeting with the security leadership 10:52:36
16 team to give them -- at the direction of my boss,
17 Salle Yoo -- an update and report to the extent
18 I -- not report, a -- a status on the -- the
19 process in consultation with lawyers from
20 WilmerHale. This was at Joe Sullivan's request and 10:53:02
21 at Salle's direction.

22 I also recall a videoconference, I -- I
23 believe perhaps all the parties were in person, but
24 with -- with Salle, with Joe, perhaps Angela,
25 perhaps Sidney, which preceded the meeting that I 10:53:26

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1 just described. It's possible our outside counsel 10:53:31
2 was on that call as well, from WilmerHale, so
3 that's...

4 Q. Other than the one meeting that you had
5 with Mr. Sullivan, Mr. Henley, Mr. Jones, and 10:53:43
6 perhaps others from the security group, did you
7 have any other discussions with members of the
8 security group regarding Mr. Jacobs' allegations?

9 A. I don't believe so.

10 Q. Did -- in that meeting, did you ask any 10:54:01
11 members of the security group to provide you with
12 documents relating to Mr. Jacobs' allegations?

13 A. No.

14 Q. And by the time you had that meeting to
15 talk about process, you had retained WilmerHale. 10:54:14

16 A. Yes.

17 Q. But you don't think the WilmerHale
18 lawyers were at the meeting?

19 A. So at the meeting that I described
20 with -- with Joe Sullivan, with Mat Henley, with 10:54:24
21 Jeff Jones -- and there were probably three or four
22 other people, I just can't recall their names,
23 maybe Rod -- Ross Worden was on the calls -- or on
24 the -- it was -- excuse me -- some people were in
25 person and others were by Zoom. 10:54:37

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1 instruct you not to answer. 11:01:36

2 THE DEPONENT: Okay. Okay. Okay.

3 Q. (By Mr. Eiseman) I don't want you to
4 tell me anything that might have been discussed,
5 but did you, yes or no, discuss the substance of 11:01:51
6 Mr. Jacobs claims at that meeting?

7 A. No.

8 Q. Did you ever discuss the substance of
9 Mr. Jacobs claims with anybody from the security
10 group? 11:02:03

11 A. No.

12 Q. You left that to WilmerHale?

13 MR. JACOBS: Objection. Form.

14 THE DEPONENT: I -- when you mean
15 "discuss," do you mean interview them, or do you 11:02:16
16 mean update them?

17 Q. (By Mr. Eiseman) No, I --

18 A. Let -- let me just try and clarify.

19 I -- I don't know what Wilmer's
20 conversations with the security team were, 11:02:27
21 period --

22 Q. Right.

23 A. -- I don't believe that WilmerHale would
24 discuss the allegations with the implicated
25 parties, if that's what you were suggesting with 11:02:35

1 I, Rebecca L. Romano, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

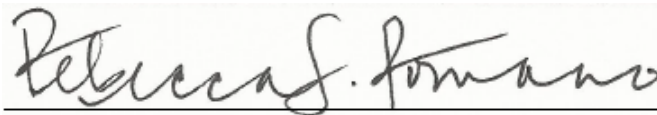
4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were administered an oath;
8 that a record of the proceedings was made by me
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10 transcribed under my direction; that the foregoing
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12 Further, that if the foregoing pertains to the
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14 Case, before completion of the proceedings, review
15 of the transcript [X] was [] was not requested.

16 I further certify I am neither financially
17 interested in the action nor a relative or employee
18 of any attorney or any party to this action.

19 IN WITNESS WHEREOF, I have this date
20 subscribed my name.

21 Dated: December 26, 2017

22
23 

24 Rebecca L. Romano, RPR,
25 CSR. No 12546

Exhibit E

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Exhibit F

12/10/2017

Waymo LLC v. Uber Technologies, Inc.
Case No. 3:14cv-00939- WHA

Uber's Privilege Log Re Communications with Trial Team Re Jacobs Documents pre November 22, 2017

Priv Log No.	Document Date	Sent By / Author	Recipients	CC	BCC	Privilege Assertion	Subject Matter of Communication	Steps Taken to Ensure Confidentiality	Received by Unauthorized Persons?	Custodian (Location)
1	4/26/2017	Duross, Charles <cduross@mofo.com>	Stern, William L. <WStern@mofo.com>; Cheung, Tiffany <TCheung@mofo.com>; Tate, Eric Akira <ETate@mofo.com>; Sprenkel, Stacey M. <SSsprenkel@mofo.com>; Dysart, Meghan E. <MDysart@mofo.com>; Carlin, John P. <JCarlin@mofo.com>; Gonzalez, Arturo J. <AGonzalez@mofo.com>	Friedman, Paul T. <PFriedman@mofo.com>		AC, WP	Email concerning legal advice regarding 4/14/17 resignation email from Richard Jacobs	Maintained in Morrison & Foerster LLP's internal and secured records repository.	To the best of Uber's knowledge, this document has not been received by unauthorized persons.	Morrison & Foerster LLP
2	4/26/2017	Sprenkel, Stacey <SSsprenkel@mofo.com>	Duross, Charles <cduross@mofo.com>; Gonzalez, Arturo J. <AGonzalez@mofo.com>	Stern, William L. <WStern@mofo.com>; Cheung, Tiffany <TCheung@mofo.com>; Tate, Eric Akira <ETate@mofo.com>; Dysart, Meghan E. <MDysart@mofo.com>; Carlin, John P. <JCarlin@mofo.com>; Friedman, Paul T. <PFriedman@mofo.com>		AC, WP	Email concerning legal advice regarding 4/14/17 resignation email from Richard Jacobs	Maintained in Morrison & Foerster LLP's internal and secured records repository.	To the best of Uber's knowledge, this document has not been received by unauthorized persons.	Morrison & Foerster LLP
3	4/26/2017	Tate, Eric Akira <ETate@mofo.com>	Sprenkel, Stacey M. <SSsprenkel@mofo.com>	Duross, Charles <cduross@mofo.com>; Gonzalez, Arturo J. <AGonzalez@mofo.com>; Stern, William L. <WStern@mofo.com>; Cheung, Tiffany <TCheung@mofo.com>; Dysart, Meghan E. <MDysart@mofo.com>; Carlin, John P. <JCarlin@mofo.com>; Friedman, Paul T. <PFriedman@mofo.com>; Rivera, Sylvia <srivera@mofo.com>; Ray, Wendy <wray@mofo.com>		AC, WP	Email concerning legal advice and work product regarding Uber's ediscovery systems.	Maintained in Morrison & Foerster LLP's internal and secured records repository.	To the best of Uber's knowledge, this document has not been received by unauthorized persons.	Morrison & Foerster LLP
4	4/27/2017	Sprenkel, Stacey M. <SSsprenkel@mofo.com>	Rivera, Sylvia <srivera@mofo.com>; Ray, Wendy <wray@mofo.com>	Duross, Charles <cduross@mofo.com>		AC, WP	Email concerning legal advice regarding Uber's ediscovery systems regarding potential investigation into Jacobs resignation letter.	Maintained in Morrison & Foerster LLP's internal and secured records repository.	To the best of Uber's knowledge, this document has not been received by unauthorized persons.	Morrison & Foerster LLP
5	4/27/2017	Ray, Wendy <wray@mofo.com>	Sprenkel, Stacey M. <SSsprenkel@mofo.com>	Rivera, Sylvia <srivera@mofo.com>; Duross, Charles <cduross@mofo.com>		AC, WP	Email concerning legal advice and work product regarding Uber's ediscovery system.	Maintained in Morrison & Foerster LLP's internal and secured records repository.	To the best of Uber's knowledge, this document has not been received by unauthorized persons.	Morrison & Foerster LLP
6	4/27/2017	Rivera, Sylvia <srivera@mofo.com>	Sprenkel, Stacey M. <SSsprenkel@mofo.com>	Ray, Wendy <wray@mofo.com>; Duross, Charles <cduross@mofo.com>		AC, WP	Email concerning legal advice and work product regarding Uber's ediscovery systems.	Maintained in Morrison & Foerster LLP's internal and secured records repository.	To the best of Uber's knowledge, this document has not been received by unauthorized persons.	Morrison & Foerster LLP
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12/10/2017

Waymo LLC v. Uber Technologies, Inc.
Case No. 3:14cv-00939- WHA

Uber's Privilege Log Re Communications with Trial Team Re Jacobs Documents pre November 22, 2017

Priv Log No.	Document Date	Sent By / Author	Recipients	CC	BCC	Privilege Assertion	Subject Matter of Communication	Steps Taken to Ensure Confidentiality	Received by Unauthorized Persons?	Custodian (Location)
8	4/27/2017	Rivera, Sylvia <srivera@mofo.com>	Sprenkel, Stacey M. <SSsprenkel@mofo.com>	Ray, Wendy <wray@mofo.com>; Duross, Charles <cduross@mofo.com>		AC, WP	Email concerning legal advice and work product regarding Uber's ediscovery systems.	Maintained in Morrison & Foerster LLP's internal and secured records repository.	To the best of Uber's knowledge, this document has not been received by unauthorized persons.	Morrison & Foerster LLP

Exhibit G

**REDACTED
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SEALED**

Exhibit H

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Exhibit I

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Exhibit J

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Exhibit K

**REDACTED
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Exhibit L

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Exhibit M

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Exhibit N

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Exhibit O

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